

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

In the Matter of:	)	
	)	
Revision of the Commission's Rules To	)	CC Docket No. 94-102
Ensure Compatibility with Enhanced 911	)	
Emergency Calling Systems	)	
	)	
Phase II Compliance Deadline for	)	
Non-Nationwide CMRS Carriers	)	
	)	
The NTELOS Companies Petition for	)	
Limited Waiver	)	
To: Wireless Telecommunications Bureau		

**STATUS REPORT  
OF THE NTELOS COMPANIES**

NTELOS Inc. on behalf of itself and its affiliates the Virginia PCS Alliance L.C.; Richmond 20 MHz LLC; and the West Virginia PCS Alliance L.C. (all doing business as, and hereinafter, "NTELOS") hereby respectfully submits this status report concerning progress NTELOS has made in reaching the Commission-mandated 95% penetration rate of location-capable handsets. As of October 25, 2006, NTELOS achieved the 95% location-capable objective. As of January 1, 2007, NTELOS had 95.63% of its customers using 911-capable handsets.

**Background**

NTELOS is a Tier III regional wireless carrier that provides service primarily in Virginia and West Virginia to approximately 367,000 subscribers. NTELOS has

implemented a handset-based location technology for the delivery of E911 Automatic Location Information (ALI) over its Code Division Multiple Access (CDMA) digital PCS network.

On October 21, 2005, NTELOS requested a limited waiver to extend the deadline in Section 20.18(g)(1)(v) of the Commission's rules. This section requires that Tier III carriers who have chosen to implement a handset-based solution to meet the location requirement for Enhanced 911 services achieve a location-capable handset penetration of 95% among subscribers by December 31, 2005.<sup>1</sup> In its Petition, NTELOS explained that certain circumstances existed that made it unlikely that NTELOS would meet the 95% subscriber penetration rate by the deadline, despite efforts to promote location-capable handsets to NTELOS' customers.

In an order released on January 27, 2006, the Commission granted NTELOS an extension of the penetration requirement until November 1, 2006. In the same order the Commission required NTELOS to file status reports on its progress every February 1, May 1, August 1, and November 1, beginning May 1, 2006. The following information is submitted in compliance with the January 27, 2006, Commission order and is the fourth update on the progress NTELOS has made toward the FCC-mandated 95% penetration requirement.

#### **NTELOS Has Succeeded in Its Efforts to Encourage Customers to Upgrade to Location-Capable Handsets**

As of January 1, 2007, NTELOS had 95.63% of its customers using 911-capable handsets. NTELOS continues to strive to increase the number of customers to a GPS-capable handset beyond the 95% penetration requirement.

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<sup>1</sup> 47. CFR §20.18 (g)(1)(v).

As reported in previous filings, NTELOS implemented a number of programs in order to meet the 95% handset penetration target:

1. Any NTELOS customer with a non-GPS handset qualifies for promotional handset pricing, irregardless of their contract status.
2. Promotional handset pricing is incorporated into all customer retention efforts and NTELOS' retention team encouraged customers with non-GPS capable handset models.
3. NTELOS offered location-capable handsets at very low prices, including a \$0.99 bar style handset, \$9.99 color flip handset and \$29.99 camera flip handset, for new or existing customers. These low prices make a handset upgrade affordable for all customers.
4. NTELOS continued its policy of refusing to activate any non-GPS capable handset that a customer, or potential customer, brought in and requested it to be activated. NTELOS no longer orders replacement parts or accessories for non-Global Positioning System (GPS) handsets and no longer repairs such handsets.

NTELOS also worked closely with the manufacturers of the handsets used by our customers in order to correct internal databases so that we had accurate reporting for location-capable handsets in service. Previously, when a customer would bring his or her own handset to a NTELOS store to be activated on our network, these handsets were designated in our databases merely as "customer provided" with no other identifying information. Using the electronic serial numbers (ESNs) for each of these handsets, NTELOS was able to identify the manufacturer of the set and then to request information from the manufacturer to determine if the handset was location capable. NTELOS particularly appreciates the cooperation and assistance provided to us by numerous handset manufacturers that allowed us to accurately classify thousands of handsets. Indeed, only one manufacturer refused to cooperate with us and so all "customer provided" handsets from that manufacturer continue to be counted by NTELOS as "non-GPS".

### **The Number and Status of Phase II 911 Requests from PSAPs**

In total, NTELOS has received 911 Phase II requests from 114 Public Safety Answering Points (PSAPs). Of the 114 requests, 85 have been implemented, 3 are in the process of implementation, and 26 requests could not be implemented because NTELOS had no coverage in the area.

### **The Dates on Which Phase II Has Been Implemented or Will Be Available**

Exhibit 1 illustrates the implementation date for each PSAP requesting Phase II deployment.

### **The Status of NTELOS' Coordination Efforts with PSAPs for Alternative 95% Handset Penetration Dates**

NTELOS has notified the PSAPs in NTELOS' coverage area with Phase II 911 requests about the progress the company has made toward the 95% penetration rate. Email notification was sent to the PSAPs on January 26, 2007, about NTELOS' current penetration rate and the completion of our goal of reaching 95%. A copy of this email is shown in Exhibit 2.

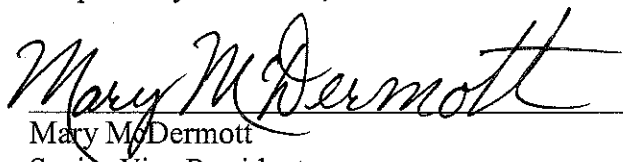
### **Conclusion**

NTELOS takes its wireless 911 obligations very seriously. We have a demonstrated record of cooperation with PSAPs in the NTELOS service areas. Although NTELOS is a relatively small carrier operating in a largely rural area, we made a significant effort in all parts of our organization which allowed us to meet 95% penetration requirement by the November 1, 2006, deadline set for us by the Commission.

NTELOS continues its efforts to replace the remaining non-GPS telephones with new 911-capable models.

Pursuant to the FCC's order released on January 27, 2006, granting NTELOS an extension of the deadline, NTELOS will continue to report to the Commission on the status of the deployment of 911-capable handsets.

Respectfully submitted,

A handwritten signature in black ink, reading "Mary McDermott", written over a horizontal line.

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